

EXHIBIT 2

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From: [Jason Rotstein](#)"**Sent:** Monday, September 8, 2025 10:45:44 PM"**To:** [Joshua J. Metcalf](#); [Perry Sanders Jr.](#); [Andrew K. Glenn](#); [Nathan Ades](#); [David Wallace](#); [Trevor J. Welch](#); [Esther Hong](#)**Cc:** [Kyle L. Gideon](#); [Daniel Mulholland](#); [Joel Fyke](#); [Taylor D. Waxley](#)"**Subject:** RE: Epperson - 30(b)(6) Deposition"**Sensitivity:** Normal"

Dear Joshua,

We understand your preference for holding the deposition in Memphis. Are you against holding the 30(b)(6) deposition in Lake Charles, LA, as originally noticed? What is your reason for holding the deposition in Memphis? We are reserving our rights to seek travel costs, as necessary.

Your email also says that you are holding a single day – Friday, October 3, 2025 – for the 30(b)(6) deposition, but as discussed at the motion hearing, the IP deposition may require multiple days.

We also previously noticed Ms. Lee's deposition in her individual capacity. We ask that you consent in writing to making Ms. Lee available – if necessary – for the following day to finish her testimony in one or both roles. We clearly have a right to an additional day to depose Ms. Lee in her individual capacity.

Please let us know by 5 p.m. on September 9, 2025, whether you agree with the approach above?

Because you requested additional time to prepare your witness, we are also reserving our rights to seek additional discovery based on the depositions and to move to compel additional discovery beyond the motion to compel deadline.

Regards,

Jason Rotstein

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